

AUG 14 2017

Sherril R. Carter, Executive Officer/Clerk
By: Charlie L. Coleman, Deputy

MICHAEL N. FEUER, City Attorney, SBN 111529
MARY CLARE MOLIDOR, Chief, Criminal & Special Lit. Branch, SBN 82404
TINA HESS, Deputy Chief, Safe Neighborhoods & Gang Div., SBN 143900
JONATHAN CRISTALL, Assistant City Attorney, SBN 191935
LORIA FORMAN-ECHOLS, Asst. Superv. Deputy City Attorney, SBN 184135
RYAN BORHO, Deputy City Attorney, SBN 275484
200 N. Main Street, Suite 966
Los Angeles, California 90012
Telephone: 213.978.4090
Fax: 213.978.4670
E-Mail: Ryan.Borho@lacity.org

Attorneys for Plaintiff

NO FEE – GOV'T CODE § 6103

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES, CENTRAL DISTRICT

THE PEOPLE OF THE STATE OF CALIFORNIA,

Plaintiff,

vs.

LISA F. BELLINASO aka LISA FABIANA
BELLINASO, an individual; ISABELLA C.
BELLINASO aka ISABELLA CRO BELLINASO,
individually and as Trustee of the Bellinaso Family
Trust Established January 25, 2001; RYAN
MATTHEW ANDREWS, an individual; and DOES 1
through 50, inclusive,

Defendants.

) CASE NO. **BC 6 7 2 1 5 2**
)
) **COMPLAINT FOR ABATEMENT AND**
) **INJUNCTION**
)
) **[HEALTH & SAFETY CODE SECTION**
) **11570, ET SEQ.; CIVIL CODE SECTION**
) **3479, ET SEQ.]**

PLAINTIFF, THE PEOPLE OF THE STATE OF CALIFORNIA, alleges as follows:

I.

INTRODUCTION

1. This action is brought and prosecuted by Plaintiff, the People of the State of California ("Plaintiff" or "People"), for the purpose of enjoining and abating a narcotics and general public nuisance existing at the single-family residence located at 8409 Remmet Avenue, Los Angeles,

1 California 91304 ("Property"). The Property is located in Canoga Park less than a half mile from the
2 Los Angeles Police Department's Topanga Community Police Station and a half mile from both Nevada
3 Elementary School and Lanark Park. It is also located within a mile of Parthenia Park. This action is
4 brought pursuant to California Health and Safety Code section 11570, et seq. ("Narcotics Abatement
5 Law") and Civil Code section 3479, et seq. ("Public Nuisance Law").

6 2. Since at least January 2011, the Property has been a known location for narcotics, gang,
7 and general nuisance activity. Drug users, including members and associates of known street gangs,
8 frequent the Property to purchase and use narcotics. Defendant LISA F. BELLINASO lives at the
9 Property with her boyfriend, Defendant RYAN MATTHEW ANDREWS. Both LISA F. BELLINASO
10 and RYAN MATTHEW ANDREWS have been arrested several times at the Property for narcotics-
11 related crimes, including possession of heroin for sales. Defendant LISA F. BELLINASO owned the
12 Property from 2002 until late 2010/early 2011 when she transferred it to a trust controlled by her mother,
13 Defendant ISABELLA C. BELLINASO.

14 3. In the past year alone, law enforcement officers have served four search warrants at the
15 Property, resulting in over a dozen arrests and the recovery of heroin, cocaine, and methamphetamine, as
16 well as implements of drug sales and use, including plastic baggies, glass pipes, syringes, digital scales,
17 and U.S. currency. Most recently, on August 3, 2017, a warrant served at the Property resulted in three
18 arrests and the seizure of heroin, methamphetamine, a glass pipe used to ingest narcotics, and
19 hypodermic needles. Defendant LISA F. BELLINASO was arrested for utility theft based on evidence
20 that power was being illegally diverted to the Property through bypass of a Department of Water and
21 Power meter.¹ In addition to the search warrants, on multiple occasions law enforcement officers have
22 arrested individuals traveling to and from the Property with narcotics, narcotics paraphernalia, stolen
23 property, and evidence of identity theft, including credit cards, debit cards, check books, and cashier's
24 checks in other people's names. Law enforcement officers have also recovered stolen vehicles at and
25 connected to the Property and arrested several individuals at the Property with outstanding arrest
26 warrants for crimes including felony drug possession and forgery. Compounding this criminal nuisance
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¹ Color photos taken during service of the August 3, 2017 search warrant are attached to this Complaint.

1 activity, the Property is maintained in a chronic state of squalor and filth with inoperable vehicles, trash,
2 and debris strewn about the Property, creating an eyesore for the community.

3 4. The Property is also a hospitable place for gang members and their associates.
4 Documented gang members and/or their associates have been arrested in connection with the Property,
5 including members and/or associates of the San Fernando Valley (SFV) Peckerwoods, a criminal street
6 gang that embraces white supremacist ideology and has ties to the Aryan Brotherhood prison gang. In
7 one instance, in October 2016, an admitted SFV Peckerwoods gang member was arrested with
8 methamphetamine while sitting in his vehicle partially blocking the driveway of the Property. Another
9 time, in December 2016, a documented and admitted SFV Peckerwoods gang member was arrested in a
10 stolen vehicle outside the Property with a rifle and live ammunition that he had used in the commission
11 of a nearby burglary. Most recently, during service of the August 3, 2017 search warrant, a documented
12 member of the Aryan Brotherhood prison gang was arrested at the Property. These and other gang
13 members are able to further their gang activity by using the Property as a safe haven to buy, sell, and use
14 narcotics, store stolen property, and exert control over the neighborhood.

15 5. This criminal and nuisance activity at the Property compromises public safety in the
16 surrounding neighborhood and causes a significantly disproportionate drain on law enforcement
17 resources. This nuisance abatement prosecution is intended to eliminate the crime and disorder at and
18 emanating from the Property; to make the Property inhospitable for criminals, including gang members,
19 who now use it to facilitate their narcotics and other criminal activities; and to make the Property safe
20 for the people who live and work in the surrounding neighborhood.

21 II.

22 THE PARTIES AND THE PROPERTY

23 A. The Plaintiff

24 6. Plaintiff is the People of the State of California, acting through the Los Angeles City
25 Attorney, Michael N. Feuer, who brings this action pursuant to the authority granted to him by Health
26 and Safety Code section 11571 and Code of Civil Procedure section 731.

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1 **B. The Defendants**

2 7. Defendant LISA F. BELLINASO aka LISA FABIANA BELLINASO ("LISA
3 BELLINASO"), 50, an individual, lives at the Property and was the record owner of the Property until
4 on or about December 21, 2010, when she transferred the Property to the Bellinaso Family Trust
5 Established January 25, 2001 ("Bellinaso Family Trust"). Defendant LISA BELLINASO is the adult
6 daughter of Defendant ISABELLA BELLINASO. Defendant LISA BELLINASO was and is involved
7 in the sale, service, storage, keeping, and/or giving away of narcotics at the Property, and has been
8 arrested on multiple occasions for narcotics and other criminal activity at the Property, including most
9 recently, the theft of utilities on August 3rd. By selling, permitting, and/or facilitating the sale, service,
10 storage, keeping and/or giving away of narcotics at the Property, Defendant LISA BELLINASO is
11 responsible for conducting and maintaining the nuisance alleged herein, thereby violating the Narcotics
12 Abatement Law and the Public Nuisance Law.

13 8. Defendant ISABELLA C. BELLINASO aka ISABELLA CRO BELLINASO
14 ("ISABELLA BELLINASO"), 79, an individual and trustee of the Bellinaso Family Trust, is the record
15 owner of the Property and Defendant LISA BELLINASO'S mother. As the owner of the Property,
16 Defendant ISABELLA BELLINASO directly or indirectly maintains and/or permits a narcotics and
17 general nuisance to exist at the Property, thereby violating the Narcotics Abatement Law and the Public
18 Nuisance Law.

19 9. Defendant RYAN MATTHEW ANDREWS ("RYAN ANDREWS"), 37, an individual,
20 lives at the Property and was and is involved in the sale, service, storage, keeping, and/or giving away of
21 narcotics at the Property. He is a long-time drug user and seller with at least seven narcotics-related
22 criminal convictions since 2000. He has been arrested on at least four separate occasions in connection
23 with narcotics activity at the Property. Upon information and belief he is the boyfriend of Defendant
24 LISA BELLINASO. By selling, permitting, and/or facilitating the sale, service, storage, keeping and/or
25 giving away of narcotics at the Property, Defendant RYAN ANDREWS is responsible for conducting
26 and maintaining the nuisance alleged herein, thereby violating the Narcotics Abatement Law and the
27 Public Nuisance Law.

1 10. The true names and capacities of defendants sued herein as DOES 1 through 50,
2 inclusive, are unknown to Plaintiff, who therefore sues these defendants by such fictitious names
3 pursuant to Section 474 of the California Code of Civil Procedure. Each such defendant is responsible
4 in some manner for conducting, maintaining, or directly or indirectly permitting the unlawful activity
5 complained of herein. When the true names and capacities of said defendants have been ascertained,
6 Plaintiff will ask leave of the court to amend this complaint and to insert in lieu of such fictitious names
7 the true names and capacities of any fictitiously named defendants.

8 **C. The Property**

9 11. The Property is a single-family residence, located at the commonly known address of
10 8409 Remmet Avenue, Los Angeles, California 91304. The Property is located on the west side of
11 Remmet Avenue south of Chase Street in Canoga Park. The residence is a tan stucco structure with
12 white trim and a grey composite shingle roof. The address "8409" is displayed in black numbers on the
13 west curb directly in front of the residence. There is a shed along the north fence in the backyard of the
14 Property.

15 12. The Property has the following legal description: "Lot 84, as shown on that certain Map
16 entitled Tract No. 21790, which Map was filed in the Office of the Recorder of County of Los Angeles,
17 State of California, in Book 600, of Maps Page(s) 17 to 20. Except therefrom all oil, gas, minerals and
18 other hydrocarbon substances lying below a depth of 500 feet from the surface of said property, but with
19 no right of surface entry, as provided in deeds of record." Assessor's Parcel No: 2779-034-004.

20 13. The Property has a reputation in the community, and among law enforcement officers, as
21 a location with longstanding and ongoing narcotics, gang, and general nuisance activity.

22 **III.**

23 **THE NARCOTICS ABATEMENT LAW**

24 14. Since its enactment in 1972, the principal purpose of the Narcotics Abatement Law
25 (Health & Saf. Code, § 11570, *et seq.*) is the abatement of buildings and places "used for the purpose of
26 unlawfully selling, serving, storing, keeping, manufacturing, or giving away any controlled substance,
27 precursor, or analog specified in this division" (Health & Saf. Code, § 11570).

15. The Narcotics Abatement Law provides that every building or place used for the purpose of unlawfully selling, serving, storing, keeping, manufacturing, or giving away any controlled substance, precursor, or analog *inter alia*, “is a nuisance which **shall** be enjoined, abated, and prevented . . . whether it is a public or private nuisance.” (Health & Saf. Code, § 11570 [emphasis added]; *People ex rel Lungren v. Peron* (1997) 59 Cal.App.4th 1383, 1389; *Lew v. Superior Court* (1993) 20 Cal.App.4th 866, 870-871.)

16. Health and Safety Code section 11571 authorizes a city attorney to bring an action to abate, prevent and perpetually enjoin such nuisances. It provides in relevant part: "Whenever there is reason to believe that a nuisance as described in Section 11570 is kept, maintained, or exists in any county, the district attorney of the county, or the city attorney of any incorporated city or of any city and county, in the name of the people, may . . . maintain an action to abate and prevent the nuisance and perpetually to enjoin the person conducting or maintaining it, and the owner, lessee, or agent of the building or place in or upon which the nuisance exists from directly or indirectly maintaining or permitting the nuisance."

17. Health and Safety Code section 11573(a) provides that: "If the existence of the nuisance is shown in the action to the satisfaction of the court or judge, either by verified complaint or affidavit, the court or judge *shall* allow a temporary restraining order or injunction to abate and prevent the continuance or recurrence of the nuisance." (Emphasis added.) In addition, Health and Safety Code section 11581 provides, as an additional remedy, for the removal and sale of all fixtures and movable property on the premises used in aiding or abetting the nuisance and for the closure of the building for up to one year.

IV.

THE PUBLIC NUISANCE LAW

18. Civil Code section 3479 defines a public nuisance as “[a]nything which is injurious to health, including, but not limited to, the illegal sale of controlled substances, or is indecent or offensive to the senses, or an obstruction to the free use of property, so as to interfere with the comfortable enjoyment of life or property, or unlawfully obstructs the free passage or use, in the customary manner, of any . . . public park, square, street, or highway . . .” (*See City of Bakersfield v. Miller* (1966) 64

1 Cal.2d 93, 99 (“The Legislature has defined in general terms the word ‘nuisance’ in Civil Code section
2 3479. . . .”).)

3 19. Civil Code section 3480 defines a public nuisance as “one which affects at the same time
4 an entire community or neighborhood, or any considerable number of persons, although the extent of the
5 annoyance or damage inflicted upon individuals may be unequal.”

6 20. In particular, gang activity, such as drug dealing, loitering, consumption of alcohol and
7 illegal drugs, and boisterous conduct which creates a “hooligan-like atmosphere” constitutes a public
8 nuisance. (*People ex rel. Gallo v. Acuna* (1997) 14 Cal.4th 1090, 1120.)

9 21. Civil Code section 3491 provides for the methods by which public nuisances such as
10 those alleged herein may be abated. Civil Code section 3491 states that the “remedies against a public
11 nuisance are indictment or information, a civil action or abatement.” Abatement is “accomplished by a
12 court of equity by means of an injunction proper and suitable to the facts of each case.” (*Sullivan v.*
13 *Royer* (1887) 72 Cal. 248, 249; *see also People v. Selby Smelting and Lead Co.* (1912) 163 Cal.84, 90
14 (“[I]n California, the rule is well established that in proper cases injunctive relief which accomplishes
15 the purposes of abatement without its harsh features is permissible.”).)

16 22. Code of Civil Procedure section 731 authorizes a city attorney to bring an action to enjoin
17 or abate a public nuisance. It provides in relevant part “[a] civil action may be brought in the name of
18 the people of the State of California to abate a public nuisance . . . by the city attorney of any town or
19 city in which such nuisance exists.”

20 23. Where “a building or other property is so used as to make it a nuisance under the statute,
21 the nuisance may be abated . . . , notwithstanding that the owner had no knowledge that it was used for
22 the unlawful purpose constituting a nuisance.” (*People ex rel. Bradford v. Barbieri* (1917) 33 Cal.App.
23 770, 779; *see also Sturges v. Charles L. Harney, Inc.* (1958) 165 Cal.App.2d 306, 318 (“a nuisance and
24 liability therefore may exist without negligence”); *People v. McCadden* (1920) 48 Cal.App. 790, 792
25 (“A judgment supported on findings that such nuisance was conducted and maintained on the premises
26 in question, regardless of the knowledge of the owner thereof, is sufficient. Such knowledge on the part
27 of the owner . . . is unnecessary.”); *People v. Peterson* (1920) 45 Cal.App. 457, 460 (“[I]t was not
28 necessary . . . for the trial court to find either, that the [defendants] threatened, and unless restrained,

1 would continue to maintain, aid, and abet, the nuisance, or that they knew the building was used in
2 violation of the act. . . . The existence of the nuisance was the ultimate fact in this case, and having been
3 found, supports the judgment.”.) This is because “the object of the act is not to punish; its purpose is to
4 effect a reformation of the property itself.” (*People v. Bayside Land Co.* (1920) 48 Cal.App. 257, 261.)

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V.

FIRST CAUSE OF ACTION FOR NARCOTICS ABATEMENT

[Health and Safety Code Section 11570, et seq. –

Against Defendants and DOES 1 through 50]

24. Plaintiff hereby incorporates paragraphs 1 through 23, above, as if fully set forth herein.

25. The Property, including every building or place wherein or upon the Property which those acts take place, has been used, and is being used, from an exact date unknown but at least since January 2011, for the purposes of unlawfully selling, serving, storing, keeping, manufacturing or giving away controlled substances in violation of Health and Safety Code section 11570, et seq. Further, the reputation of the Property in the community, and among law enforcement, is that it is a location where the sale, use, and storage of narcotics has taken place on an ongoing and continuous basis since at least January 2011.

26. Defendants, and DOES 1 through 50, are responsible for conducting, maintaining, and/or directly or indirectly permitting the nuisance as alleged herein. Plaintiff has no plain, speedy, and adequate remedy at law, and unless Defendants, and DOES 1 through 50, are restrained and enjoined by order of this Court, they will continue to use, occupy, and maintain, and/or aid, abet or permit, directly or indirectly, the use, occupation, and maintenance of the Property, together with the fixtures and appurtenances located therein, for the nuisance complained of herein, to the great and irreparable damage of the public and in violation of California law.

VI.

SECOND CAUSE OF ACTION FOR PUBLIC NUISANCE

[Civil Code Section 3479, et seq. –

Against Defendants and DOES 1 through 50]

27. Plaintiff hereby incorporates paragraphs 1 through 26, above, as if fully set forth herein.

28. Since at least January 2011, through the present time, the Property has been owned, operated, occupied, used, and/or directly or indirectly permitted to be occupied and used, in such a manner as to constitute a public nuisance in violation of Civil Code sections 3479 and 3480. The public nuisance, as described herein, is injurious to health, indecent or offensive to the senses, and/or an obstruction to the free use of property, so as to substantially and unreasonably interfere with the comfortable enjoyment of life or property by those persons living in the surrounding community. The public nuisance at the Property consists of, but is not limited to, the illegal sale, service, keeping, storage and/or giving away of controlled substances that occurs at or related to the Property; the threatening and disorderly presence of gang members and/or their associates at the Property; the presence of stolen goods and evidence of identity theft at and connected to the Property; and the state of disorder that pervades the Property and its surroundings.

29. Defendants, and DOES 1 through 50, in owning, conducting, maintaining, and/or permitting the use of the Property, directly or indirectly, as a public nuisance, have engaged in wrongful conduct and caused a serious threat to the general health, safety and welfare of the persons in the area surrounding the Property.

30. Unless Defendants, and DOES 1 through 50, are restrained and enjoined by order of this Court, they will continue to use, occupy and maintain, and aid, abet or permit, directly or indirectly, the use, occupation, and maintenance of the Property, together with the fixtures and appurtenances located therein, for the purpose complained of herein, to the great and irreparable damage of Plaintiff and in violation of California law.

PRAYER

WHEREFORE, PLAINTIFF PRAYS THAT THIS COURT ORDER, ADJUDGE AND DECREE AS FOLLOWS:

AS TO THE FIRST CAUSE OF ACTION

31. That each Defendant and the Property, including all buildings and structures thereon, be declared in violation of Health and Safety Code section 11570, *et seq.*

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1 32. That the Property, together with the fixtures and moveable property therein and thereon,
2 be found to constitute a public nuisance and be permanently abated as such in accordance with Section
3 11581 of the California Health and Safety Code.

4 33. That the Court grant a preliminary injunction, permanent injunction and order of
5 abatement in accordance with Section 11570, *et seq.*, of the California Health and Safety Code,
6 enjoining and restraining each Defendant, and any agents, officers, employees, and anyone acting on
7 their behalf, from unlawfully selling, serving, storing, keeping, manufacturing, or giving away
8 controlled substances on the Property, and/or directly or indirectly maintaining or permitting such
9 nuisance activity.

10 34. That the Court order physical and managerial improvements to the Property in
11 accordance with Health and Safety Code section 11573.5 to remedy the nuisance on the Property and
12 enhance the abatement process, including but not limited to the following: posting signs on the Property
13 prohibiting trespassing, loitering, and illegal weapons and narcotics; signing an L.A.M.C. section 41.24
14 Trespass Arrest Authorization form; installing secure gating, fencing, and lighting; removing all
15 surveillance cameras; complying with any regulatory orders, including but not limited to orders issued
16 by the Department of Building and Safety; prohibiting individuals previously arrested at or connected to
17 the Property access to the Property at any time; evicting tenants, including but not limited to Defendant
18 RYAN ANDREWS, engaging in criminal activity at the Property; and prohibiting members and/or
19 associates of the San Fernando Valley Peckerwoods, or any other criminal gang, access to the Property
20 at any time.

21 35. That as part of the Judgment, an Order of Abatement be issued, and that the Property be
22 closed for a period of one year, not to be used for any purpose, and be under the control and custody of
23 this Court for said period of time; or, in the alternative, if the Court deems such closure to be unduly
24 harmful to the community, that Defendants pay an amount equal to the fair market rental value of the
25 Property for one year to the City or County in whose jurisdiction the nuisance is located in accordance
26 with Health and Safety Code section 11581 subdivision (c)(1).

27 36. That each Defendant be assessed a civil penalty in an amount not to exceed twenty-five
28 thousand dollars (\$25,000.00).

1 37. That all fixtures and moveable property used in conducting, maintaining, aiding or
2 abetting the nuisance at the Property be removed by the LAPD and sold in the manner provided for the
3 sale of chattels under execution. Said fixtures and property shall be inventoried and a list prepared and
4 filed with this Court.

5 38. That there shall be excepted from said sale, such property to which title is established in
6 some third party not a defendant, nor agent, officer, employee, or servant of any defendant in this
7 proceeding.

8 39. That the proceeds from said sale be deposited with this court for payment of the fees and
9 costs of sale. Such costs may occur in closing said Property and keeping it closed, removal of said
10 property, and Plaintiff's costs in the action, including attorneys' fees, and such other costs as the court
11 shall deem proper.

12 40. That if the proceeds of the sale do not fully discharge all such costs, fees and allowances,
13 the Property shall also be sold under execution issued upon the order of the court or judge and the
14 proceeds of such sale shall be applied in a like manner. That any excess monies remaining after
15 payment of approved costs shall be delivered to the owner of said Property. Ownership shall be
16 established to the satisfaction of this court.

17 41. That each Defendant, and any agents, trustees, officers, employees and anyone acting on
18 their behalf, and their heirs and assignees, be perpetually enjoined from transferring, conveying, or
19 encumbering any portion of the Property, for consideration or otherwise, without first obtaining the
20 Court's prior approval.

21 42. That each Defendant be ordered to immediately notify any transferees, purchasers,
22 commercial lessees, or other successors in interest to the subject Property of the existence and
23 application of any temporary restraining order, preliminary injunction, or permanent injunction to all
24 prospective transferees, purchasers, commercial lessees, or other successors in interest, before entering
25 into any agreement to sell, lease or transfer the Property, for consideration or otherwise, all or any
26 portion of the Property that is the subject of this action.

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1 43. That each Defendant be ordered to immediately give a complete and legible copy of any
2 temporary restraining order and preliminary and permanent injunctions to all prospective transferees,
3 purchasers, lessees, or other successors in interest to the Property.

4 44. That each Defendant be ordered to immediately request and procure signatures from all
5 prospective transferees, purchasers, lessees, or other successors in interest to the subject Property, which
6 acknowledges his/her respective receipt of a complete, legible copy of any temporary restraining order,
7 preliminary and permanent injunction, and deliver a copy of such acknowledgment to the Los Angeles
8 City Attorney's Office, c/o Deputy City Attorney Ryan Borho or his designee.

9 45. That Plaintiff recover the costs of this action, including attorneys' fees and law
10 enforcement investigative costs, in an amount not to exceed \$500,000.00.

11 AS TO THE SECOND CAUSE OF ACTION

12 46. That the Property, together with the fixtures and moveable property therein and thereon,
13 be declared a public nuisance and be permanently abated as such in accordance with Civil Code section
14 3491.

15 47. That each Defendant, and any agents, officers, employees, and anyone acting on their
16 behalf, and their heirs and assignees, be preliminarily and perpetually enjoined from operating,
17 conducting, using, occupying, or in any way permitting the use of the Property as a public nuisance.
18 Such orders should include, but not be limited to, physical and managerial improvements to the
19 Property, and such other orders as are appropriate to remedy the nuisance on the Property and enhance
20 the abatement process.

21 48. That Plaintiff be granted such costs as may occur in abating said nuisance at the Property
22 and such other costs as the Court shall deem just and proper.

23 49. That Plaintiff be granted such other and further relief as the Court deems just and proper,
24 including closure and/or demolition of the Property.

25 AS TO ALL CAUSES OF ACTION

26 50. That Plaintiff recover the amount of the filing fees and the amount of the fee for the
27 service of process or notices which would have been paid but for Government Code section 6103.5,
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1 designating it as such. The fees may, at the Court's discretion, include the amount of the fees for
2 certifying and preparing transcripts.

3 51. That Plaintiff be granted such other and further relief as the Court deems just and proper,
4 including but not limited to the appointment of a receiver.

5
6 DATED: August 14, 2017

Respectfully submitted,

7 MICHAEL N. FEUER, City Attorney
8 JONATHAN CRISTALL, Assistant City Attorney
9 LIORA FORMAN-ECHOLS, Asst. Superv. Deputy City Atty

10 By: 

11 RYAN BORHO, Deputy City Attorney
12 Attorneys for Plaintiff, THE PEOPLE OF THE STATE
13 OF CALIFORNIA
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